

1 MR. WILSON: Yes.

2 (Eltzroth Deposition Exhibit No. 3 was
3 marked for identification.)

4 BY MR. WILSON:

5 Q. The only page I'm going to ask you questions
6 about is the next-to-last page, but feel free to review
7 the whole document if you would like.

8 MR. SEEGULL: Why don't you review the
9 whole document. We're off the record.

10 (Discussion off the record.)

11 BY MR. WILSON:

12 Q. I'd like to refer you to the next-to-last page
13 of the document. It's marked D-10065 at the bottom.

14 Have you ever seen this document before?

15 A. No.

16 Q. Have you ever seen documents like this before?

17 A. No.

18 MR. WILSON: That's all the questions I
19 have for you right now. Mr. Seegull may have some
20 questions for you.

21 MR. SEEGULL: No, no questions.

22 (Deposition concluded at 2:10 p.m.)

23 - - - - -

24



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1 T E S T I M O N Y

2

3 DEPONENT: DOROTHY J. ELTZROTH PAGE

4

5 BY MR. WILSON..... 2

6

7 E X H I B I T S

8

9 ELTZROTH DEPOSITION EXHIBIT NO. MARKED

10

11 1 - A copy of a four-page document

12 entitled, "Computer Sciences Corporation

13 Annual Management Incentive Plan," dated

14 April 2, 1983..... 23

15 2 - A copy of a multi-page document

16 entitled, "Code of Ethics and Standards

17 of Conduct"..... 33

18 3 - A copy of a five-page document Bates

19 numbered D-10062 through D-10066..... 35

20 ERRATA SHEET/DEPONENT'S SIGNATURE PAGE 37

21

22 CERTIFICATE OF REPORTER PAGE 38

23

24



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REPLACE THIS PAGE

WITH THE ERRATA SHEET

AFTER IT HAS BEEN

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CERTIFICATE OF REPORTER

STATE OF DELAWARE)

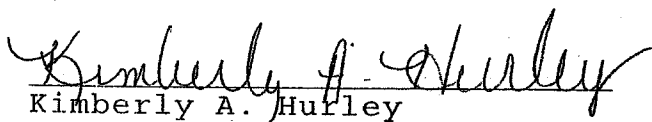
)

NEW CASTLE COUNTY)

I, Kimberly A. Hurley, Registered Professional Reporter and Notary Public, do hereby certify that there came before me on the 31st day of March, 2006, the deponent herein, DOROTHY J. ELTZROTH, who was duly sworn by me and thereafter examined by counsel for the respective parties; that the questions asked of said deponent and the answers given were taken down by me in Stenotype notes and thereafter transcribed by use of computer-aided transcription and computer printer under my direction.

I further certify that the foregoing is a true and correct transcript of the testimony given at said examination of said witness.

I further certify that I am not counsel, attorney, or relative of either party, or otherwise interested in the event of this suit.


Kimberly A. Hurley

Certification No. 126-RPR
(Expires January 31, 2008)

DATED: _____

4/26/06

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ORIGINAL

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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BRIAN MILLER; HECTOR CALDERON; : Case No.
CHARLES FOLWELL; ROLLAND GREEN; : 05-010-JJF
DAWN M. HAUCK; KEVIN KEIR; :
ASHBY LINCOLN; KAREN MASINO; :
ROBERT W. PETERSON; SUSAN M. :
POKOISKI; DAN P. ROLLINS; :
and WILLIAM SPERATI; :

Plaintiffs :

vs :

COMPUTER SCIENCES CORPORATION, :
a Delaware Corporation :

Defendants :

Wednesday, April 26, 2006
Mount Laurel, New Jersey

Oral Deposition of JAMES STYLES
taken pursuant to Notice, at the Law Office of
Capehart Scatchard, Laurel Corporate Center, 8000
Midlantic Drive, Suite 300, Mount Laurel, New
Jersey, commencing at approximately 8:47 a.m., on
the above date, before Tracey L. Pinsky, CSR, RPR
and Notary Public.

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JAMES STYLES

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I N D E X

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JAMES STYLES

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1 JAMES STYLES, after having been
2 first duly sworn, was examined and testified as
3 follows:

4 EXAMINATION

5 BY MR. WILSON:

6 Q. Good morning, Mr. Styles. My name
7 is Tim Wilson, and I'm the attorney for the
8 plaintiffs in the lawsuit Miller versus Computer
9 Sciences Corporation. Initially, I want to go
10 over a few instructions, prior to starting the
11 deposition, just so the deposition goes smoother
12 and so you understand what's going to happen.

13 A. Uh-huh.

14 Q. First, I'm going to be asking you
15 questions pertaining to the lawsuit. And when you
16 respond, you must do so verbally. This is so the
17 court reporter can -- can get an accurate record
18 and, you know, it's hard for her to take down
19 nonverbal communications.

20 A. I understand.

21 Q. You've just been sworn in. So, as
22 you know, your testimony is under oath, so you
23 must answer truthfully just as if you were in
24 court. When I ask you a question and you respond

1 to that question, I'm going to assume that you
2 heard and understood it. If you don't hear a
3 question or don't understand it, please let me
4 know and I'll ask it again or explain it. Please
5 let me finish asking the question before you
6 answer, and I will extend the same courtesy to
7 you, and that, again, we can have a cleaner
8 transcript. If, at any time, you come to realize
9 that a statement you made is incorrect or
10 inaccurate, let me know, and you will be permitted
11 to clarify the record.

12 Under Delaware rules, you cannot
13 talk or confer with you attorney during deposition
14 either in here or during breaks, unless it
15 pertains to a matter of privilege, in which case
16 the attorneys will object and instruct you not to
17 answer?

18 A. What's a matter of privilege?

19 Q. A matter of privilege is
20 communications between you and your attorneys.

21 A. Okay.

22 Q. If, at any time, you need a break to
23 go to the rest room or for any other reason, let
24 me know and we'll take a break. Okay?

JAMES STYLES

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1 A. Un-huh.

2 Q. Do you understand these
3 instructions?

4 A. I do.

5 Q. Okay. Just like to get a little
6 background information before we start. Where
7 were you born and what is your birth date?

8 A. I was born in Camden, New Jersey.
9 My birth date is July 27, 1958.

10 Q. And what is your Social Security
11 number?

12 A. 149-52-9824.

13 Q. And your current address?

14 A. Is 105-D Cherry Parke, P-a-r-k-e, in
15 Cherry Hill, New Jersey.

16 Q. And how long have you lived there?

17 A. Two months.

18 Q. I assume you rent?

19 A. No, I own.

20 Q. You own, okay. Sorry.

21 Have you ever been arrested?

22 A. No.

23 Q. Did you serve in the military?

24 A. No, I did not.

JAMES STYLES

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1 Q. Did you go to college?

2 A. Yes, I did.

3 Q. And where did you go?

4 A. La Salle.

5 Q. Did you get a degree?

6 A. Yes.

7 Q. And what's your degree in?

8 A. I have a bachelor of science in
9 business. I have a MBA in HR and finance.

10 Q. Is the MBA from --

11 A. La Salle.

12 Q. -- La Salle as well?

13 A. Yes.

14 Q. Okay. Did you graduate with any
15 honors?

16 A. Only my mom's.

17 Q. Okay. As I understand it, you are
18 not presently employed by CSC?

19 A. That is correct.

20 Q. And when did you stop working for
21 CSC?

22 A. March 17th, I believe, mid March, on
23 a Friday.

24 Q. 2006?

1 A. That is correct.

2 Q. And where do you work now?

3 A. With AstraZeneca, it's a
4 pharmaceutical company.

5 Q. Where are you located, where is your
6 office located?

7 A. Wilmington, Delaware.

8 Q. Right there on 202?

9 A. Uh-huh, yes.

10 Q. What's your title with AstraZeneca?

11 A. Director of leadership and team
12 development.

13 Q. When you did work for CSC, what was
14 your job title, your most recent job title?

15 A. Director of human resources.

16 Q. And how long did you hold that
17 title?

18 A. Started in September of 2002, so
19 that's three-and-a-half years.

20 Q. And what does the director of human
21 resources do?

22 A. It's the representative in the
23 conduit for people-related processes. So
24 processes related to staffing, to communications,

1 to benefits administration at a local level,
2 succession planning, learning and development,
3 administrating compensation, so.

4 Q. Who did you report to?

5 A. I had two people I reported to
6 because CSC is a matrix organization. I had a
7 solid line to Gus Siekierka, and then most
8 recently to Tom Bailey. And Tom took over for
9 Gus. And I had the dotted line to Nick Wilkinson.

10 Q. What does a solid line mean?

11 A. When you report to more than one
12 person, you are ultimately accountable to one. I
13 mean, one person who does the hiring, firing,
14 promotions, is responsible for your performance,
15 for your advancement, those types of things. And
16 that was -- when I left -- I guess I should just
17 pick a name, I mean. When I left it was
18 Tom Bailey, for the most part it was
19 Gus Siekierka.

20 Q. And what does dotted line mean?

21 A. That you have some level of
22 accountability, but Nick can't order me, for all
23 intents and purposes. I guess the closest thing
24 to describe it is that Nick would be somewhat of

1 my internal client. So he can say, Jim, I'd like
2 these things, but ultimately he couldn't make me.

3 Q. Okay.

4 A. But he could make my life miserable
5 if he wanted to.

6 Q. You said CSC is matrix a
7 organization, what does that mean?

8 A. It's -- God, how do you describe a
9 matrix. I'll try to describe it by describing a
10 formal organization. A formal organization is
11 more command and control. Where it starts from
12 the top and organization spreads down
13 geometrically, like a pyramid. So -

14 Q. Okay.

15 A. -- at the top you are pointing to
16 the next level, the next level.

17 In a -- in a matrix organization,
18 you have some of that, but the people resources
19 are coming from a different direction. So in our
20 business unit, for instance, technology management
21 group, the accounting -- the account management --
22 the people who do the business strategy and the
23 implementation of the strategy and the growing of
24 the business, sales marketing, finance, HR, all

1 those are in TMG.

2 But the people who perform the
3 functions like the network administrators, network
4 architects, the help desk employees, they don't
5 report in that chain. They're -- they're a pool
6 of resources that come to bare in the client
7 environment. So you have two organization
8 structures that come together. So that's the best
9 I can do. Frankly, it's very confusing, a matrix
10 organization. In fact, we -- we -- we say that
11 matrix organization is an oxymoron, because it's
12 -- it's -- it's a bit confusing.

13 Q. Okay. Prior to becoming director of
14 human resources, did you work for CSC then, as
15 well?

16 A. Yes.

17 Q. Okay. And what was your position
18 then?

19 A. Senior manager, human resource
20 development.

21 Q. And how long did you hold that
22 position?

23 A. I was in that group for 11 years. I
24 had started as a consultant in -- in that function

JAMES STYLES

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1 then progressed to senior consultant to manager to
2 senior manager, so.

3 Q. When -- when you say consultant,
4 what does that mean?

5 A. It's -- it's really more of a job
6 title. It's to -- it's to indicate that I was an
7 individual contributor.

8 Q. Okay. So you were still a -- a CSC
9 employee when you --

10 A. Oh, yes.

11 Q. -- worked as a consultant?

12 A. Yes, yes. Yeah, it's more of a
13 title, I was not a consultant to the company, I
14 was as an internal resource.

15 Q. Okay. And -- and what year did you
16 start working for CSC?

17 A. Started working for them in 19 --
18 January of 1989.

19 Q. '89?

20 A. '89.

21 Q. Okay. What did you do to prepare
22 for today's deposition?

23 A. Outside of -- of preparation
24 yesterday, nothing really.

JAMES STYLES

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1 Q. Did you meet with Mr. Seegull --

2 A. Yes.

3 Q. -- or your attorney?

4 A. Yes.

5 Q. And when did you meet with them?

6 A. Last night.

7 Q. Last night.

8 How long did you meet with them?

9 A. An hour. I'm -- I'm guessing on
10 that, sorry.

11 Q. Did you review any documents?

12 A. No.

13 Q. Did you review any deposition
14 transcripts that have been taken in this case?

15 A. No.

16 Q. Did you talk to anybody other than
17 your attorneys to prepare for this deposition?

18 A. No.

19 Q. You talked to Dorothy Ellsroth about
20 this case, at one point, correct?

21 A. That is correct.

22 Q. And what did you discuss?

23 A. Actually, I don't remember. Don't
24 remember. I -- I'm not -- I -- I would believe

1 that Dot and I talked because I took over for Dot.
2 Dot was the director of human resources for this
3 business unit, and she moved onto something else
4 and I replaced her. So it wasn't uncommon for Dot
5 and I to talk about, you know, the business -- the
6 business of that space. We -- we talked about it
7 on a fairly continuous basis.

8 Q. What business unit are you referring
9 to?

10 A. Chemical accounts.

11 Q. Do you recall when you last spoke to
12 Ms. Ellsroth about this case?

13 A. No. No. No. Sorry, I don't.

14 Q. Do you recall where you were when
15 you had this conversation?

16 A. I'd -- I'd assume in our -- in our
17 HR suite.

18 Q. Have you talked to anybody else in
19 general terms about the lawsuit?

20 A. No.

21 Q. Did you -- strike that.

22 Are you aware of the basis for this
23 lawsuit?

24 A. Yes, I am.

1 Q. And what's your understanding?

2 A. That there are 11 people that filed
3 a lawsuit because they felt it was unfair that
4 they were removed from AMIP -- it's an acronym,
5 A-M-I-P, it's a management incentive program --
6 that they were removed from AMIP. They felt it
7 was unfair, so they're -- they're suing to -- to
8 get what they feel they should have gotten.
9 That's as I understand it.

10 Q. Do you have an understanding as to
11 why they feel it's unfair?

12 A. No.

13 Q. If I represented that they felt they
14 were being removed retroactively, would -- would
15 that -- would that sound correct to you?

16 A. Could you rephrase that. I don't
17 quite understand what you mean by that?

18 Q. If I represented that -- that they
19 allege that they were eligible for the program,
20 then they were formed -- informed that they were
21 ineligible back to a certain date, and their claim
22 is for that period in between, does that sound --

23 A. I understand.

24 MR. SEEGULL: Let -- let me just say

1 something Tim. Maybe -- maybe the best thing to
2 do instead of asking about what they have alleged
3 or -- or not, why don't you just ask him what his
4 knowledge is. Focus on what he knows.

5 MR. WILSON: Okay. I -- I -- well,
6 I want to -- I want to -- I'm just trying to give
7 him some guidance to see if -- if he does
8 understand what the -- what the lawsuit is about.

9 MR. SEEGULL: Well, he's given you
10 his -- his understanding.

11 MR. GEANEY: I think he said he
12 understands your question.

13 BY MR. WILSON:

14 Q. Does that sound familiar to you,
15 sir?

16 MR. SEEGULL: How -- how can it
17 sound familiar? He hasn't spoken to the
18 plaintiffs, what their understanding is.

19 MR. WILSON: I'm asking what his
20 understanding is.

21 MR. SEEGULL: Well, you asked him,
22 does that sound familiar, you didn't ask him what
23 his understanding is.

24 BY MR. WILSON:

JAMES STYLES

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1 Q. Is that your understanding, sir?

2 A. You have to go back to what it is
3 you are asking me to understand, Tim. I don't
4 mean --

5 MR. WILSON: Okay.

6 THE WITNESS: -- to be purposely
7 difficult, I -- I want to understand the question.

8 BY MR. WILSON:

9 Q. I understand. By retroactive, I
10 mean the plaintiffs were allegedly eligible for
11 the AMIP program.

12 A. Okay.

13 Q. They were informed that they were no
14 longer eligible.

15 A. Uh-huh.

16 Q. But when they were informed, it
17 reverted back to a previous date, when they
18 considered they were eligible. Is that your
19 understanding?

20 A. That makes sense, yes.

21 Q. When you were employed by CSC, did
22 you participate in the AMIP program?

23 A. I did.

24 Q. So you have an understanding as to

1 what the program is?

2 A. Yes, I do.

3 Q. Can you tell me what your
4 understanding is?

5 A. As part, at a certain level in CSC
6 you're rewarded for your contribution to the
7 success of the business above and beyond your
8 salary and merit increases on a yearly basis.
9 There's an incentive compensation program. And in
10 CSC it's called AMIP. You're given targets, the
11 targets vary year to year. For the years that I
12 was in it, it was predominantly how the success of
13 the business, so it was revenue targets, operating
14 income targets, things like that. And at the end
15 of the year you see how you did against these
16 targets, and that's where your bonus came in.

17 Q. Okay. When you say you are rewarded
18 for your contribution, what do you mean by
19 contribution?

20 A. I believe that the philosophy of
21 AMIP is, and why it's given to people at a higher
22 level, is that your contribution, the contribution
23 that you make, is more apt to have an impact on
24 revenue growth, operating income, health and such.

1 So as a way of engaging the -- the mind and the
2 actions of -- of the said employees to a
3 particular outcome, that's -- that's why something
4 like an AMIP exists, that's -- that's what they
5 want you to do.

6 Q. When does the contribution occur?

7 A. When I'm saying contribution, I mean
8 my individual contribution as an employee. It
9 occurs on a daily basis, I mean, every day I show
10 up I'm making a contribution.

11 Q. Is the AMIP program based on CSC's
12 fiscal year?

13 A. Yes.

14 Q. And is the fiscal year from
15 April 1st until March 31st of any particular year?

16 A. Loosely, yeah. I mean, it actually
17 isn't literally April 1st, it's -- it's the last
18 week in March. Sometimes that could be like
19 April 2nd, April 3rd, but its general knowledge is
20 that it's April 1st. I think that's a fair enough
21 statement.

22 Q. Okay. And -- and when you are
23 talking of contribution, does that contribution
24 occur throughout the fiscal year?

1 A. Yes, it does.

2 Q. Were you involved in the transition
3 of DuPont employees to CSC in 1997?

4 A. I was not.

5 Q. Do you know how long CSC has had the
6 AMIP program?

7 A. For sure, no. My -- my guess is
8 it's been around since the eighties. I mean, I
9 joined in '89, I think it was there then.

10 Q. Have you always been eligible for
11 AMIP?

12 A. No.

13 Q. When did you become eligible?

14 A. AMIP was when I started this -- the
15 job in September of 2002. I was on another
16 incentive program, it wasn't AMIP, though. It was
17 more like a discretionary bonus, I guess, for --
18 from '91 to 2002. Started as a 10 percent and
19 somewhere near the end it switched to 20.

20 Q. How would you receive the
21 discretionary bonus?

22 A. Yearly, kind of the same way with
23 AMIP. And it was -- is an objective-driven bonus,
24 same thing as AMIP.

JAMES STYLES

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1 Q. Were the objectives the same as
2 AMIP?

3 A. No, actually it wasn't. The -- the
4 objectives for the discretionary bonus that I was
5 in was all towards of -- pretty much my
6 performance. So there were things that Jim Styles
7 had to accomplish in a given year, and then at the
8 end of year we evaluated my individual performance
9 against the targets and a bonus was -- was given.

10 Q. So is it fair to say, the
11 discretionary bonus was based more upon your
12 individual objectives as opposed to business
13 objectives with AMIP.

14 A. That is correct.

15 Q. When the AMIP bonuses are
16 calculated, they input numbers from the business
17 from the -- the prior fiscal year, correct?

18 A. Oh, can you ask that again? I lost
19 you at the end.

20 Q. The -- the numbers that they use to
21 calculate the AMIP bonuses with respect to the
22 business objectives, those numbers come -- are
23 derived throughout the entire fiscal year,
24 correct?

1 A. It's those numbers that I'm not sure
2 what you mean. Do -- can you -- can you
3 substitute that pronoun with a noun?

4 Q. The -- the -- say the earnings, for
5 example?

6 A. Yes.

7 Q. Say if earnings for the company are
8 an objective?

9 A. Uh-huh.

10 Q. Those earnings come from throughout
11 the entire fiscal year, correct?

12 A. Yeah, they -- the -- the numbers --
13 the targets for the business typically didn't come
14 into the fiscal, well into the fiscal year. I
15 mean, you didn't start April 1st with your
16 business targets.

17 Q. Okay. So when -- are you saying
18 that they didn't start collecting the data to use
19 for their calculations until the targets were
20 established?

21 A. Correct.

22 Q. So there was -- if, for example,
23 they used earnings for the company as one of the
24 objectives, the earnings for the entire fiscal

1 year would not be calculated into -- into
2 determining if the individuals received their AMIP
3 bonus per that objective?

4 A. I'm sorry, Tim, I'm kind of losing
5 you.

6 Q. Yeah. If -- if income is one of the
7 objectives.

8 A. Okay. Operating income. Okay.

9 Q. Okay.

10 A. All right.

11 Q. Whenever they are at the end of the
12 year, whenever the numbers are calculated, do they
13 start collecting the data at whenever the targets
14 are set, or do they start collecting the data from
15 the beginning of the fiscal year?

16 A. What data being collected?

17 Q. The data that would go into the
18 operating income, the final numbers?

19 A. Well, they'd -- they would collect
20 operating income data on a continuous basis from
21 day one in the fiscal year. I mean, that's a --
22 that's a continuous financial process. As it
23 relates to AMIP -- what happens early in the
24 fiscal year with AMIP is they'll determine what

1 weight different measurements will take into
2 place. So let's say, for instance, for the
3 business unit that revenue growth is going to be
4 very important for this coming fiscal year. We
5 don't know what that revenue growth is in numbers,
6 we just know that it's going to be important.

7 Q. Un-huh.

8 A. So hypothetically say, all right,
9 let's say revenue we're going to make 40 percent
10 of 100 percent of a bonus. So 40 percent of that
11 weight is going to be a revenue, because that's
12 where we want in emphasis. So they'll --
13 they'll -- in the beginning in AMIP, they'll know
14 what the weighteds are, because they know in a
15 general sense the direction they want to take the
16 business in and what they want to focus on, be it
17 profitability, revenue, growth, whatever.

18 What it takes a while to get and
19 takes a number of months to get is what exactly is
20 the target, what exactly is the revenue number.

21 So, you know, the -- the revenue
22 number for AMIP might be, again, hypothetically
23 speaking, just so you understand in terms of
24 numbers our -- our previously fiscal year could be

1 like 1.8 billion in revenue and our new target is
2 2.2 billion. That specific number doesn't come
3 until months into the fiscal year, because it
4 takes them a while to kind of figure it out.

5 Q. Okay. So --

6 A. But they -- but they know when the
7 fiscal year starts that the weight of average is
8 going to be 40 percent of the weight of that is
9 going to be on revenue. It's not told until some
10 months go down that they say, well, the target
11 number is 2.2 billion.

12 Q. So when they are calculating revenue
13 growth to see if you reach 2.2 billion, is that --
14 does that start when the target is established or
15 does that start at the beginning of the fiscal
16 year?

17 A. You don't know if you reached it
18 until the end of the fiscal year.

19 Q. I -- I understand that, but whenever
20 they -- whenever they're adding up all the revenue
21 growth to reach the final number, do they add all
22 the numbers from the entire fiscal year?

23 A. I'm sorry, Tim, I -- I don't
24 understand your question.

JAMES STYLES

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1 Q. To arrive at the final number for
2 revenue growth --

3 A. To see if you got there.

4 Q. Right.

5 A. Okay.

6 Q. They have to input numbers, correct?
7 How -- okay. Explain to me how you would arrive
8 at -- at the final number for revenue growth?

9 MR. SEEGULL: I'm -- I'm going to
10 object. On the lack of foundation. I don't think
11 you established whether or not he had any
12 responsibility for calculating AMIPs or coming up
13 with the weightings or targets or anything like
14 that.

15 MR. WILSON: Well, he's -- he's
16 explained that -- that he understands the -- how
17 the AMIP program works, and -- and based upon his
18 answer so far, I think he has an understanding.

19 MR. SEEGULL: Objection. Lack of
20 foundation. I don't think you've established what
21 his role was in any of this.

22 BY MR. WILSON:

23 Q. Do you understand how the final
24 numbers are calculated in AMIP?

1 A. I'm going to oversimplify it, Tim.
2 I mean, accounting keeps track of revenue dollars.
3 We add it up at the end of the year, and that's
4 what our revenue dollars are.

5 Q. Okay.

6 A. I mean, it's an accounting function.

7 Q. Do you -- when it's added up at the
8 end of the year, do you know whether it's the time
9 period from which the numbers are gathered to add
10 it up?

11 A. If I'm understanding your question
12 correctly, I believe it takes 45 days for us to
13 close our books. So at the end of our fiscal year
14 it takes about 45 days to finish the accounting
15 processes, finish accounts payable, accounts
16 receivable, close accounts until you have final --
17 final numbers.

18 Q. So are you saying the revenue growth
19 only comes from those 45 days?

20 A. No, no.

21 Q. What's the time period in which the
22 revenue growth is grown?

23 MR. SEEGULL: Objection. This is
24 speculative. He says he's -- it's an accounting

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1 function. He doesn't, isn't in charge of, has --
2 had no responsibilities for measuring revenue.

3 THE WITNESS: I think it's a fair
4 observation, Tim. I mean, I'm telling you
5 accounting principles and I, you know, the -- the
6 revenue growth is what it is, you know, it's -- we
7 generate revenue at the end of year. And that's
8 about the best I got for you.

9 BY MR. WILSON:

10 Q. So is it your testimony that -- that
11 you don't under -- that you have no knowledge of
12 the time period in which the data is collected to
13 come up with the final numbers?

14 MR. SEEGULL: Objection. He's given
15 you his knowledge, he's told you what he knows.

16 MR. WILSON: You can answer the
17 question.

18 THE WITNESS: Can you ask it again,
19 please?

20 BY MR. WILSON:

21 Q. Okay. Is it your testimony that you
22 have no knowledge as to the time period that the
23 numbers are collected to come up with the final
24 numbers for the AMIP?

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1 MR. SEEGULL: I'm going to object.
2 He's -- he's told you what his knowledge is. Mr.
3 Styles is a former employee, he has a limited
4 amount of time to give to this deposition. I
5 suggest we just move it along and focus on what
6 his role was.

7 MR. WILSON: Okay. You can answer
8 the question.

9 MR. SEEGULL: What his role was as
10 an HR person in implementation --

11 MR. WILSON: Larry, you can object
12 to the form.

13 MR. SEEGULL: -- of this AMIP
14 provisions. I suggest we just move it along.

15 MR. GEANEY: You can answer.

16 MR. SEEGULL: You can answer if you
17 want to answer. Asked and answered, but go ahead.

18 THE WITNESS: I'm -- I'm sorry, each
19 time I -- I lose my train of thought. Can -- can
20 you ask again, even transcribe it. I had the
21 answer in my head. I'm losing it.

22 MR. WILSON: Can -- can you ask --
23 can you read the question back, please.

24 (Pertinent portion of the record is

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1 read as follows:

2 "QUESTION: Is it your testimony
3 that you have no knowledge as to the time period
4 that the numbers are collected to come up with the
5 final numbers for the AMIP?")

6 MR. SEEGULL: Same objection.

7 THE WITNESS: Okay. No. I do have
8 knowledge of that, and I -- but I believe that it
9 is 45 days, I don't know for sure, Tim. I'm not
10 in accounting, I'm not the finance guy. I'm --
11 I'm the HR guy. You know, gathering the numbers
12 around what our revenue was and how we ended up
13 the year and all that is not in my domain. But as
14 an employee of 17, 18 years, you kind of learn
15 things. So does that --

16 BY MR. WILSON:

17 Q. Okay. So it's only 45 days that --
18 that the -- the --

19 A. I believe.

20 Q. Okay. So why is the AMIP program
21 based on a fiscal year?

22 MR. SEEGULL: Objection, vague and
23 ambiguous.

24 THE WITNESS: I don't quite

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1 understand, Tim. It is based on the fiscal year.

2 BY MR. WILSON:

3 Q. Right. But -- but you're saying
4 that the data that they use to -- to award the
5 AMIP program only comes from the last 45 days of
6 the fiscal year?

7 MR. SEEGULL: Objection,
8 mischaracterizes his testimony.

9 THE WITNESS: Yeah, that's -- that's
10 not true, Tim.

11 BY MR. WILSON:

12 Q. Okay. Well, tell me your
13 understanding, then.

14 MR. SEEGULL: Objection. He's given
15 his understanding.

16 MR. WILSON: What his -- what he
17 told me was 45 days.

18 THE WITNESS: It takes -- it
19 takes forty --

20 MR. SEEGULL: Objection. It
21 mischaracterizes his testimony. Go ahead, you can
22 answer again.

23 THE WITNESS: It takes 45 days in
24 order to get the final numbers, Tim. We're not

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1 measured on those last 45 days. At the end of the
2 fiscal year, say, March 31st, on March 31st, we
3 don't have all the numbers that says how we did in
4 the year. There's -- there's still bills to
5 collect. There's still bills to pay. There's
6 just processing. There's closing books in
7 accounting. And you don't know literally on
8 March 31st, we're not that sophisticated
9 information-technology-wise, nor is, I think, any
10 other company, to be able to say on March 31st,
11 literally here's all our numbers. It takes
12 literally 45 days to say, all right, let's get it
13 clear. It's -- in a personal level, it's like
14 writing checks and making deposits on a Friday and
15 you know literally on that Friday where you stand
16 totally financially, I mean, you don't. I mean,
17 you have to balance your checkbook and you have to
18 call Charles Schwab and get your statements and,
19 you know, do all this stuff. You don't literally
20 know on that last day.

21 So the AMIP is measured on the
22 fiscal year. And it's everything that's
23 transpired in the year. All we're saying about
24 the 45 days is from an accounting standpoint, it

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1 takes them 45 days to get their stuff together so
2 they can give you an accurate, not only just AMIP,
3 it takes 45 days to close the books, so that they
4 can satisfy what they have to do at the FCC. You
5 know, we're a publically traded company, so,
6 financially, we have to do that due diligence.
7 That 45 days is something absolutely necessary to
8 give accurate information so we award our
9 earnings. You know, it's -- it's a necessity. It
10 has nothing to do with AMIP.

11 BY MR. WILSON:

12 Q. Do individuals who are participating
13 in the AMIP program, are they required to be in
14 the program during the fiscal year to receive
15 the -- to receive an AMIP bonus?

16 A. Yes.

17 Q. And a person who is in the -- who's
18 eligible for the program for six months, would --
19 they wouldn't get a full share for a full fiscal
20 year, correct?

21 MR. SEEGULL: Objection.

22 BY MR. WILSON:

23 Q. I'll ask it again. A person who's
24 in the program for six months wouldn't get an AMIP

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1 bonus for the -- calculated on the entire fiscal
2 year, correct?

3 MR. SEEGULL: Objection.
4 Speculation.

5 MR. WILSON: You can --

6 MR. SEEGULL: Are you asking what
7 happened in this particular case with these people
8 that were removed from AMIP?

9 THE WITNESS: I could answer the
10 question hypothetically.

11 MR. WILSON: You can answer.

12 THE WITNESS: If somebody's promoted
13 mid year --

14 MR. WILSON: Yes.

15 THE WITNESS: -- into an AMIP
16 eligible position and they were promoted into that
17 role six months into the year, they would get a
18 six-month prorated bonus.

19 Does that answer your question?

20 BY MR. WILSON:

21 Q. Yes, sir. Thank you. And why --
22 why is it that the bonus would be prorated?

23 A. Because they weren't performing in
24 that particular role for the established number of

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1 months.

2 Q. So does that mean they were
3 contributing for six months, therefore, they would
4 receive six months worth of bonus?

5 A. In that hypothetical situation?

6 Q. Yes.

7 A. Yes.

8 Q. Participation in the program is
9 supposed to be evaluated annually, correct,
10 individual participation?

11 A. That is policy.

12 Q. When's the evaluation supposed to
13 occur?

14 A. I don't know.

15 Q. If someone is added to the program,
16 are they notified immediately of their
17 eligibility?

18 A. Immediately, can I have some
19 parameters on that.

20 Q. Within a couple of weeks?

21 A. Yes.

22 Q. When you were -- became eligible for
23 the AMIP program, were you notified within a
24 couple of weeks?

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1 A. Yes.

2 Q. And once you are deemed eligible for
3 the AMIP bonus your participation continues until
4 you are notified that you are no longer eligible
5 for the AMIP program, correct?

6 A. Correct.

7 Q. Is the AMIP program an entitlement
8 program?

9 A. What do you consider an entitlement
10 program?

11 Q. Is it a -- a program that if you
12 achieve -- strike that. That's been asked and
13 answered.

14 Is the AMIP bonus part of an
15 individual salary?

16 A. No.

17 Q. And what is it, if it's not salary?

18 A. It's incentive compensation. It's
19 additional compensation. It's a -- it's a
20 strategy that the terminology would be a -- a
21 total reward strategy. A total reward strategy is
22 everything from a remuneration standpoint that's
23 supposed to energize and engage an employee
24 towards the success of the business. So your

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1 salary, your merit increases, discretionary bonus,
2 your AMIP bonus, benefits, education assistance,
3 all those types of things, all that is considered
4 total reward strategy.

5 Q. Who is Gary Lewis? Do you know?

6 A. Yeah, I think Gary's in GTS,
7 Global -- the Newark regional center guy, I think.

8 Q. Does he hold a superior position to
9 you? Did he when you were employed at CSC?

10 A. He was in another part of the
11 matrix. I -- I think he was a director level. I
12 mean, if you are going by level in the
13 organization, we're the same. But, you know, I'm
14 the support function in HR and he's in operations,
15 so that operations people typically have more
16 weight than HR function.

17 Q. Okay.

18 A. So, sorry, Tim, I don't know how to
19 answer your question cleanly.

20 Q. You testified that -- that certain
21 objectives had to be met -- met by the
22 individuals in order to receive the AMIP bonus.

23 A. Un-huh.

24 Q. In that regard is -- are AMIP

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1 bonuses earned by the individuals?

2 MR. SEEGULL: Objection. For what
3 point in time?

4 MR. WILSON: Just in general.

5 MR. SEEGULL: Objection. Calls for
6 speculation, depends upon what happens.

7 MR. WILSON: You can answer the
8 question.

9 THE WITNESS: Can I hear it again,
10 please?

11 MR. WILSON: Can you read it back,
12 please?

13 (Pertinent portion of the record is
14 read back as follows:

15 "QUESTION: In that regard are AMIP
16 bonuses earned by the individuals?")

17 MR. SEEGULL: Same objection.

18 THE WITNESS: Yeah.

19 BY MR. WILSON:

20 Q. When you were eligible for the AMIP
21 bonus, was there ever a year that you did not
22 receive it?

23 A. No.

24 Q. Were you notified every year that

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1 you were eligible to receive it?

2 A. No. Well, read the question again?

3 MR. WILSON: Can you read it back,
4 please?

5 THE WITNESS: I don't mind if you
6 read it to me.

7 (Pertinent portion of the record is
8 read back as follows:

9 "QUESTION: Were you notified every
10 year that you were eligible to receive it?")

11 THE WITNESS: No.

12 MR. WILSON:

13 Q. Are you aware that on September 11,
14 2003, there were a number of individuals removed
15 from the AMIP program?

16 A. Yes.

17 Q. And -- and how were you aware of
18 this?

19 A. It was something that was being
20 considered at a group level for, my memory's
21 sketchy, I'll say for a number of weeks, maybe
22 even a month or longer. And there were some
23 dialogue around it, amongst HR people, so we knew
24 it was being considered.

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1 Q. Who were the decision makers?

2 A. I didn't --

3 Q. On that issue?

4 A. Yeah, I don't know the decision
5 makers, all of the decision makers for sure. I
6 know at -- at least one would be Gus. Anybody
7 else beyond that, I'd be speculating.

8 Q. What's your understanding as to why
9 the individuals were removed from the program?

10 MR. SEEGULL: Objection. Calls for
11 speculation as to what was in Gus' mind.

12 MR. WILSON: I -- I asked him what
13 his understanding was.

14 MR. SEEGULL: His understanding of
15 what was in Gus' mind?

16 MR. WILSON: No, what his
17 understanding as to why they were removed from the
18 program.

19 MR. SEEGULL: He didn't make the
20 decision to remove them.

21 MR. WILSON: I'm asking what his
22 understanding was.

23 MR. SEEGULL: Go ahead, if you can
24 answer.

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1 THE WITNESS: My understanding is
2 that they were removed because the AMIP program's
3 original intent was to have people that are at a
4 particular level of contribution in the
5 organization. And it had gotten to the point
6 where people who didn't meet the criteria for
7 being an AMIP were to be removed.

8 MR. WILSON:

9 Q. Okay. Did you receive e-mails on
10 this topic, of the removal of the individuals?

11 A. I'm going to guess that I did, Tim,
12 but I don't remember. I don't recall.

13 Q. Are you aware of anybody raising any
14 concerns about removing these individuals from the
15 program?

16 A. Yes.

17 Q. Who?

18 A. Me.

19 Q. What was your concern?

20 A. My concern in general wasn't
21 necessarily for these 11 people, Tim. My concern
22 in general is that we seemed to be implementing a
23 decision that was geared on the -- the -- purely
24 on the level that somebody had in terms of their

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1 salary grade. So I believe it was salary grade
2 level six and above, if you were salary grade
3 level six and above you were in AMIP. And if you
4 were salary grade five and below, you were out.
5 And it was fairly objective.

6 And my concern in doing that was
7 that there were -- there were people in the
8 organization that might not be up to a level six,
9 but could have a significant impact on the success
10 of the business. And to remove them from AMIP
11 could dis-energize, disengage these people. It
12 could tick them off, it could get them to a point
13 where, you know, they're speaking poorly about CSC
14 to our clients. I mean, there was concerns along
15 those lines.

16 Q. Did you communicate this concern to
17 anybody?

18 A. Yes.

19 Q. To whom?

20 A. To Gus.

21 Q. And what was his response?

22 A. I don't remember his exact response.

23 Q. Did you communicate that to anybody
24 else?

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1 A. Yes.

2 Q. To whom?

3 A. Nick Wilkinson.

4 Q. What was Nick's response?

5 A. I think Nick, well, I'd be
6 speculating. His exact response, I don't
7 remember. I'm inclined to believe he shared the
8 same opinion.

9 Q. As you?

10 A. Correct.

11 Q. Did anybody else -- did -- strike
12 that.

13 Did you express the -- this concern
14 to anybody else?

15 A. Probably.

16 Q. Do you recall who?

17 A. No.

18 Q. To your knowledge, did anybody else
19 raise any concerns?

20 A. I don't know.

21 Q. To your knowledge, did anybody raise
22 a concern that the action was being done
23 retroactively?

24 A. Can you repeat the question, please.

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1 Q. To your knowledge, did anybody raise
2 a concern that this action was being conducted
3 retroactively?

4 A. By retroactive, you mean that what?

5 Q. The -- the people were informed on
6 September 11, 2003.

7 A. Uh-huh.

8 Q. Yet the fiscal year started roughly
9 on April 1st?

10 A. I understand the question.

11 Q. And they were informed that -- that
12 the action was being taken retroactive to
13 April 1st?

14 A. Yes.

15 Q. Did anybody raise a -- an issue or a
16 concern that the actions were being done
17 retroactively?

18 A. Yes.

19 Q. And who was that?

20 A. Me.

21 Q. What was your concern?

22 A. My concern was that if we were to
23 remove somebody from a program, that one of two
24 things really should happen. If you're going to

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1 remove them for the year, you tell them in the
2 beginning of year. If you are going to remove
3 them mid year, then since you didn't tell them in
4 the beginning of the year that they're out, that
5 in fairness to the employees -- even though you
6 are not entitled to necessarily as a company --
7 but in fairness to the employees, you should pay
8 them for the amount that -- that they worked until
9 the point where you told them they're not eligible
10 anymore.

11 Q. Who did you express this concern to?

12 A. Gus Siekierka.

13 Q. Do you recall what his response was?

14 A. I do not.

15 Q. Anybody else?

16 A. Not that I remember.

17 Q. Did anybody else raise the same
18 concern about the retroactive removal?

19 A. I don't remember, Tim. I -- I got
20 to tell you, it was a very hot button, so I'm sure
21 there was a lot of dialogue around it. I just
22 don't remember who said what and who believed
23 what.

24 Q. Do you recall anybody raising the

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1 concern that it may be illegal?

2 A. No.

3 Q. Were there any exceptions what --
4 what -- you testified earlier that there was a
5 certain salary grade and below that there was --
6 the people were -- were removed, and you said it
7 was fairly objective. Were there any
8 exceptions --

9 A. No.

10 Q. -- made to this?

11 A. Not that I'm aware of.

12 Q. Do you know who Robert Cardin is?

13 A. I do not.

14 Q. Do you recall what the final payout
15 percentage for fiscal year 2004 was for the
16 chemical group?

17 A. I do not.

18 Q. Did you have a conversation with
19 Karen Masino following the September 11th decision
20 to remove these individuals?

21 A. I've talked to Karen after that in
22 different context, yes.

23 Q. But not regarding the AMIP program?

24 A. If I did, I don't remember.

1 Q. I'd just like to ask you a few
2 questions about some documents.

3 A. Sure.

4 Q. When these individuals were notified
5 that they were no longer eligible for the AMIP
6 program, they became eligible for a discretionary
7 bonus program, correct?

8 A. That is correct.

9 Q. Can you tell me what that
10 discretionary program -- how that -- how that was
11 calculated for the individuals?

12 A. It doesn't have the -- the same
13 level of rigor as the AMIP. It's -- it's
14 literally discretionary, and the discretionary is
15 the emphasis on the manager's or supervisor's
16 discretion of whether they believed an individual
17 is making a contribution that is above and beyond
18 the call of duty, if you will. And that's what
19 the discretionary in discretionary bonus means.

20 I think it was a max of ten percent
21 maybe. No, no. It was a dollar figure. Maybe it
22 was 10,000, I -- I'm sorry, I'm losing this. I
23 think it was 10,000 was the max, Tim. And you
24 can't receive two, I mean, you can only be in one

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1 bonus pool. So if you are in AMIP, you're not
2 entitled to discretionary bonus, and vice versus.
3 So these people were not AMIP, therefore, by
4 default they're entitled to being considered for
5 discretionary bonus.

6 Q. Was the discretionary bonus based
7 upon key result areas?

8 A. Correct.

9 Q. What are key result areas?

10 A. KRA, key result areas are, for lack
11 of a better term, the objectives that are set for
12 an individual for a coming year. Specifically,
13 it's meant to quantify as -- as -- as much as
14 possible and -- and make what's subjective
15 objective, so that you can measure at the end of
16 the given year, did this individual make a
17 demonstrative contribution to the success of the
18 business.

19 Q. Are the KRAs comparable to the
20 objectives in the AMIP program?

21 A. No.

22 Q. What's the difference?

23 A. The objectives in AMIP program, for
24 the most part, typically about 80 percent of your

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1 bonus, 80 percent of whatever your percentage is.
2 So the weighted averaged of 80 percent is
3 typically the -- the business success. So how --
4 how did your business do in terms of revenue? How
5 did your business do in terms of operating income?
6 How did it do in terms of margin? Whatever other
7 financial drivers are important. KRAs are more --
8 I'll personalize it. So, for me, it might be that
9 I'm going to implement a town hall meeting and
10 make sure they're run on a quarterly basis. I'm
11 going to implement a learning and development
12 strategy which increases utilization of our
13 learning tools by 20 percent. So it's -- it's my
14 specific contribution, it's not how the business
15 does. But the reason they exist is believed there
16 is a link between me doing my job and the success
17 of the business.

18 Q. The -- you said that 80 percent of
19 AMIP bonus was -- was business success. What was
20 the other 20 percent?

21 A. The personal individual
22 contribution.

23 Q. So what --

24 A. So it would be things like I just --

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1 just mentioned -- strike that.

2 It would be -- it could be things
3 like I just mentioned, could be other things.

4 Q. What other things?

5 A. Like, I think, in this year for --
6 for my AMIP, I -- I don't know because I wasn't
7 there long enough to -- to -- to be in it this
8 year -- but I think there was something in there
9 around making HR global because our -- our
10 business unit had -- did business in Europe and
11 Australia and such. So -- and our -- our business
12 leader, Tom Bailey, felt it was important to make
13 part of our AMIP targets in -- within that 20
14 weighted percentage, how well we're integrating.
15 So he kind of took ownership of what that last
16 20 percent looks like.

17 Q. Okay.

18 A. And that is his discretion to do
19 that.

20 Q. With respect to the 80 percent of
21 the AMIP bonus that is attributable to business
22 success --

23 A. Un-huh.

24 Q. -- the -- the individuals that were

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1 removed on September 11th, during the period
2 from -- from April 1st to September 11, 2003, were
3 they contributing to this business success?

4 A. Every employee is contributing to
5 the business success, so I'd -- I'd have to answer
6 that question yes, in that context.

7 (Exhibit Styles-1 marked for
8 identification.)

9 BY MR. WILSON:

10 Q. You've been handed what's been
11 marked as Styles-1, take your time and -- and
12 review that and I have a couple questions
13 regarding this document.

14 A. Okay.

15 Q. Mr. Styles, were you currently
16 copied -- strike that.

17 What is this document?

18 A. The entire thing?

19 Q. Yes.

20 A. The first two pages are an e-mail
21 from John Walker. John Walker is the director of
22 compensation for all of America's outsourcing,
23 that includes the business units, TMG, GIS, and
24 G -- G -- let me do it again. TMG, GTS, and GIS.

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1 Those three business units together are what we
2 call America's outsourcing. John Walker is the
3 director of compensation for America outsourcing.
4 His boss and my boss, at the time, was
5 Gus Siekierka. So it's an e-mail from John to
6 Gus.

7 John is informing Gus that he sent
8 this e-mail out for wide distribution to one of
9 our three business units which is GIS. That's
10 infrastructure business, so it's all the help
11 desk, networks, that type of stuff.. The first
12 person on the list is the president of GIS, which
13 is Russ Owen. And the rest of those people are
14 senior level players in that business unit.
15 They're all from the operations. The courtesy
16 copies are all HR people. So these are all folks,
17 for the most part, that support these business
18 folks. So John's informing Russ Owen, the
19 president of GIS, and Russ' director of courts, it
20 looks like, that the AMIP targets are being
21 established for that year.

22 Q. Okay. And you're carbon copied on
23 this e-mail, correct?

24 A. That is correct.

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1 Q. Okay. Are there -- does the e-mail
2 indicate that there are attachments to the e-mail?

3 A. I believe so, yes. Yes.

4 Q. And are the attachments the third
5 through sixth pages of this exhibit?

6 A. I'd imagine they are, Tim, yes.

7 Q. I -- I'd like to direct your
8 attention to the third page.

9 A. Uh-huh.

10 Q. Can you tell me what this is?

11 A. Here's where they determined, start
12 to determine the weighted average of an
13 individual's goals for their AMIP. The levels
14 mean the levels down in the organization, so I'll
15 explain the rows. The management level, level
16 two, is one level down from a division president.
17 Level three is the next level down. Level four is
18 the next level down. Level five is the next level
19 down. So it's talking about layers in an
20 organization. Even though you're at a different
21 level you may have a different function, like
22 direct reports where there is two rows for -- for
23 level two, one is direct reports to group
24 president and line of service leads and staff.

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1 And they're separating here for GIS
2 from regional service delivery. So depending on
3 what specific nature of your role is, they start
4 saying, well, given the nature of your role where
5 should the weight of your targets be. So if you
6 are taking the first row, the -- the columns that
7 are marked financial targets, that's all the
8 things that are -- are business driving. EPS is
9 earnings per share. GIS, global financials, GIS
10 has targets for the year. ROI is return on
11 investment. I'm not sure why -- okay, subtotal
12 there, there's regional financial and regional
13 account eagle measures. Account eagle is an
14 internal reward of CSC. To earn an eagle means
15 your business unit achieved all its targets.

16 So what they are doing here is
17 establishing the weighted average. They don't
18 have the exact numbers yet, here at this point in
19 time, but they have the weighted average. So they
20 know the management level, level two, that reports
21 to group president and is in line of service lead
22 in staff. The weighted average of their AMIP is
23 going to be 20 percent on CSC's earnings per
24 share, 50 percent on GIS' global financials,

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1 10 percent on CSC's -- no, I don't know. Here I'm
2 not sure whether CSC or GIS is return on
3 investment, and so that' subtotal comes to
4 80 percent. So the 80 percent is the -- so for an
5 individual in that particular role, 80 percent of
6 their AMIP target is going to be on these
7 financial targets.

8 You move towards the further --
9 further down in terms of columns, now there's your
10 personal goals. So there is 20 percentage points
11 left, and they're dividing it for someone at this
12 level, 10 percent is going to be team oriented
13 personal goals and 10 percent individual oriented
14 personal goals.

15 Q. Okay.

16 A. And that's how you come up with, you
17 know, your full rated average of 100 percent.

18 Q. Okay. What are team oriented
19 personal goals?

20 A. It could be -- it could be anything.
21 I mean, it could be where a -- a business leader
22 says that we're all going to be responsible for
23 landing the air products account. You know,
24 there's -- there's not necessarily a financial

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1 target for that, but -- so it falls into something
2 that's more of a personal. It doesn't necessarily
3 mean the personal person. It may mean that it's
4 not one of the financial drivers. But it's
5 important to the success of the business. So --
6 so a business leader might share that, well, let's
7 say, all right, for 10 percent of the AMIP bonus
8 is going to be contingent on us winning the air
9 products account.

10 Q. Okay. Could you briefly describe
11 what individual goal is?

12 A. It could be the, hypothetically
13 again, let say air products is -- is the target
14 that we're going to win for that year, and it
15 might be that I'm given the responsibility of
16 creating the effective -- an effective proposal on
17 the business and I have to have it done by X date.

18 Q. Okay. And at all levels, all the --
19 the weighted averages for all the team personal
20 goals at all levels was 10 percent, correct?

21 A. That's what it looks like, yes.

22 Q. And for the individual personal
23 goals, the weighted average was 10 percent?

24 A. That's what it looks like, yes.